

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MAERSK LINE,

- against -

ANDERSON INTERNATIONAL  
GLOBAL, LLC, a/k/a WORLDWIDE  
PAPER CO.,

Plaintiff,

**JUDGE KOELTL**

CIVIL COMPLAINT  
IN ADMIRALTY

Defendant.



Plaintiff MAERSK LINE, by its attorneys, LAW OFFICES OF ALBERT J. AVALLONE & ASSOCIATES, as and for its Complaint against defendant ANDERSON INTERNATIONAL GLOBAL, LLC, a/k/a WORLDWIDE PAPER CO., in personam, in a cause of action civil and maritime, alleges upon information and belief:

1. This is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure, the Ocean Shipping Reform Act of 1999, 46 U.S.C., App. Section 1701, et seq., and Paragraph 14.4 of the Bills of Lading.
2. At all times hereinafter mentioned, plaintiff MAERSK LINE was and still is a corporation duly organized and existing under the laws of the State of Delaware with offices and a place of business at 6000 Carnegie Blvd., Charlotte, NC 28209.
3. Upon information and belief and at all times hereinafter mentioned, defendant had and now has the legal status and place of business as set forth in Schedule A.
4. On or about the dates and at the ports of shipment stated in Schedule A, certain goods were delivered to plaintiff to be carried to the ports of destination and at the agreed charges to be paid by defendant pursuant to plaintiff's published tariff, all as set forth in Schedule A.
5. Thereafter, the goods were carried to the ports of destination and

delivered to the consignee and/or its agents.

6. Plaintiff has performed all duties and obligations required to be performed by plaintiff.

7. Defendant has failed and refused and continues to fail and refuse to remit payment of \$13,122.00, although duly demanded.

8. By reason of the foregoing, plaintiff has sustained damages in the amount of \$13,122.00 which, although duly demanded, have not been paid.

WHEREFORE, plaintiff prays:

1. For judgment in the amount of plaintiff's damages, together with interest thereon, costs, disbursements and a reasonable attorney's fee.


2. That process in due form of law according to the practice of this Court in cases of admiralty and maritime jurisdiction may issue against the defendants citing them to appear and answer all the singular matters aforesaid.

3. That plaintiff have such other and further relief in the premises as in law and justice it may be entitled to receive.

Dated: New York, New York  
April 30, 2007

LAW OFFICES OF  
ALBERT J. AVALLONE & ASSOCIATES

By

  
Albert J. Avallone - AA1679  
Attorneys for Plaintiff  
MAERSK LINE  
551 Fifth Avenue, Suite 1625  
New York, NY 10176  
(212) 696-1760

## I. Defendant's status &amp; address:

A. Upon information and belief and at all times hereinafter mentioned, defendant ANDERSON INTERNATIONAL GLOBAL, LLC, a/k/a WORLDWIDE PAPER CO. was and still is a corporation organized and existing under the laws of the State of Illinois, with offices and a place of business at 60-B West Terra Cotta Ave. #234, Crystal Lake, IL 60014, with an agent for service of process at Law Offices of Andrew Sagartz, 1880 W. Winchester Road, Suite 206, Libertyville, IL 60048.

## II. Details of shipment(s):

1. Bill of Lading No. MAEUTOR203329, dated May 16, 2005, from Long Beach to Haiphong via Los Angeles on the Vessel CARSTEN MAERSK, seven (7) forty-foot Hi-Cubes SAID TO CONTAIN: WHITE TISSUE BALES, at the applicable tariff charge of \$5,317.00 (Exhibit A).

Amount Paid: \$0

Amount Due: \$5,317.00

2. Bill of Lading No. MAEUTORDA0280, dated September 12, 2005, from Oakland to Nhava Sheva on the Vessel SL LIGHTENING, five (5) forty-foot Hi-Cubes SAID TO CONTAIN: WASTE PAPER, at the applicable tariff charge of \$7,805.00 (Exhibit B).

Amount Paid: \$0

Amount Due: \$7,805.00

III. Total Amount Due: \$13,122.00





TRANSPORT BY CONTAINER VESSEL .  
ON BOARD CARSTEN MAERSK V.806  
EX LOS ANGELES,CA ,USA ON 15  
MAY 2005  
SFD:K20650511037006  
POINT OF ORIGIN: USA C7  
\*USA  
\*\*VIETNAM

MAERSK INC.

